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December 23, 2019

Via ECF

The Honorable Katherine Polk Failla, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

MEMO ENDORSED

Re: *Leible, et al. v. Maison Kayser, LLC, et al.*
Case No. 18-cv-11150 (KPF)

Dear Judge Failla:

We are counsel for Plaintiffs in the above-referenced matter. We write, jointly with counsel for Defendants, to respectfully request an extension of time for the parties to submit a discovery status update currently due today and an extension of the discovery and deposition deadline.

The parties have met and conferred on December 9, 17 and 23, 2019 (C.K. Lee and Angela Kwon for Plaintiffs and Christine Hogan and Joseph Flanagan for Defendants) on various issues for this action, including the pre-certification discovery addressed during the November 7, 2019 hearing, the deposition schedule, a stipulation of conditional collective action certification, and the possibility of class-wide mediation. However, in light of the holidays, Defendants request additional time to formulate a position on each of these issues.

Based on the foregoing, the parties respectfully request an extension until January 10, 2020 to inform the Court of either (i) the parties' plans to participate in mediation for a contemplated class and collective action settlement, or (ii) the parties' position on pre-certification discovery. In addition, the parties respectfully request a 90-day extension of the fact discovery and deposition deadline, from December 31, 2019 to March 30, 2020, to continue discovery for this matter.

We thank the Court for its time and consideration.

Respectfully submitted,

/s/ C.K. Lee
C.K. Lee, Esq.

cc: all parties via ECF

Application GRANTED. No further extensions of the deadline for the completion of discovery will be contemplated, unless made necessary by the parties' participation in mediation.

Dated: December 26, 2019
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla". The signature is written in a cursive, flowing style.

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE